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<u>REMARKS</u>

In the Non-Final Office Action, Examiner Dinh objected to and rejected pending claims 11-30 on various grounds. The Applicant responds to each rejection as subsequently recited herein:

A. Examiner Dinh objected to pending claims 13, 18 and 22.

The Applicant has amended independent claims 18 and 22 per Examiner

Dinh's instructions to thereby obviate the objections of pending claims 18 and 22.

The Applicant respectfully asserts that the recitation of "said first resonant inductor connected in series to said inverter" is necessary to complete a definition of "a second series resonant, series loaded configuration, and is therefore essential to claim 13.

Withdrawal of objection of pending claims 13, 18 and 22 is therefore respectfully requested.

B. Examiner Dink rejected pending claims 11, 12, 22, 23 and 29 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,323,305 to *Reda* et al.

The Applicant has thoroughly considered Examiner Dinh's remarks concerning the patentability of pending claims 11, 12, 22, 23 and 29 over *Ikeda*. The Applicant has also thoroughly read *Ikeda*. To warrant this anticipation rejection of claims 11, 12, 22, 23 and 29, *Ikeda* must show each and every limitation of independent claims 11, 22 and 29 in as complete detail as in contained in independent claims 11, 22, and 29. See, MPEP §2131. The Applicant respectfully traverses this anticipation rejection of independent claims 11, 12, 22, 23 and 29, because *Ikeda* fails to disclose, teach or suggest the following limitations of independent claims 11, 22 and 29:

1. "a first LED array having a first anti-parallel configuration" as recited in independent claims 11 and 22; and

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2. "at least one LED array, each LED array having an anti-parallel configuration" as recited in independent claim 29.

Specifically, as illustrated in FIG. 14, *Ikedu* discloses a LED array having a parallel configuration, and a diode array D6-D9 for establishing two flow paths for an AC current. The first flow path is through diode D6, the entire LED array, and diode D7. The second flow path is through diode D8, the entire LED array, and diode D9.

Ikedu fails to teach or suggest an anti-parallel configuration of the LED array as required by independent claims 11, 22 and 29 due to a failure to teach a first subset of parallel LEDs and a second set of parallel LEDs opposing the first subset of parallel LEDs. As such, Ikeda teaches away from the first flow path being through diode D6, the first subset parallel LEDs, and diode D7, and the second flow path being through diode D8, the second subset of the parallel LEDs and diode D9.

Withdrawal of the rejection of independent claims 11, 22 and 29 under 35 U.S.C. §102(b) as being anticipated by *Ikeda* is respectfully requested.

Claims 12 depends from independent claim 11. Therefore, dependent claim 12 includes all of the elements and limitations of independent claim 11. It is therefore respectfully submitted by the Applicant that dependent claim 12 is allowable over *Ikeda* for at least the same reason as set forth herein with respect to independent claim 11 being allowable over *Ikeda*. Withdrawal of the rejection of dependent claim 12 under 35 U.S.C. §102(b) as being anticipated by *Ikeda* is respectfully requested.

Claim 23 depends from independent claim 22. Therefore, dependent claim 23 includes all of the elements and limitations of independent claim 22. It is therefore respectfully submitted by the Applicant that dependent claim 23 is allowable over *Ikeda* for at least the same reason as set forth herein with respect to independent claim 22 being allowable over *Ikeda*. Withdrawal of the rejection of dependent claim 23 under 35 U.S.C. §102(b) as being anticipated by *Ikeda* is respectfully requested.

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C. Examiner Dinh rejected pending claims 24 and 30 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,323,305 to *Ikeda* in view of WO 01/01385 A1 to *Reymond*.

Applicants traverse rejections to claims 24 and 30 under 35 U.S.C. §103(a). There is no suggestion or motivation to combine Ikeda with Reymond to arrive at the claimed invention. Furthermore, claim 24 depends from independent claim 22. Therefore, dependent claim 24 includes all of the elements and limitations of independent claim 22. It is therefore respectfully submitted by the Applicant that dependent claim 24 is allowable over *Ikeda* in view of *Reymond* for at least the same reason as set forth with respect to independent claim 22 being allowable over *Ikeda*. Withdrawal of the rejection of dependent claim 24 under U.S.C. §103(a) as being patentable over *Ikeda* in view of *Reymond* is therefore respectfully requested.

Claim 30 depends from independent claim 29. Therefore, dependent claim 30 includes all of the elements and limitations of independent claim 29. It is therefore respectfully submitted by the Applicant that dependent claim 30 is allowable over *Ikeda* in view of *Reymond* for at least the same reason as set forth with respect to independent claim 29 being allowable over *Ikeda*. Withdrawal of the rejection of dependent claim 30 under U.S.C. §103(a) as being patentable over *Ikeda* in view of *Reymond* is therefore respectfully requested.

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C. Examiner Dinh rejected pending claims 24 and 30 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,323,305 to Ikeda in view of WO 01/01385 A1 to Reymond.

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Claim 24 depends from independent claim 22. Therefore, dependent claim 24 includes all of the elements and limitations of independent claim 22. It is therefore respectfully submitted by the Applicant that dependent claim 24 is allowable over Ikeda in view of Reymond for at least the same reason as set forth with respect to independent claim 22 being allowable over Ikeda. Withdrawal of the rejection of dependent claim 24 under U.S.C. §103(a) as being patentable over Ikeda in view of Reymond is therefore respectfully requested.

Claim 30 depends from independent claim 29. Therefore, dependent claim 30 includes all of the elements and limitations of independent claim 29. It is therefore respectfully submitted by the Applicant that dependent claim 30 is allowable over Ikeda in view of Reymond for at least the same reason as set forth with respect to independent claim 29 being allowable over Ikeda. Withdrawal of the rejection of dependent claim 30 under U.S.C. §103(a) as being patentable over skeda in view of Reymond is therefore respectfully requested.

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SUMMARY

Examiner Dinh's objections of claims 13, 18 and 22 have been obviated by the remarks herein corresponding to claim 13 and the amendments herein to claims 18 and 22. Examiner Dinh's §102(b) rejection of claims 11, 12, 22, 23 and 29, and §103(a) rejection of claims 24 and 30 have been obviated by the remarks herein supporting an allowance of 11, 22 and 29 over Ikeda. The Applicant respectfully submits that claims 11-30 as amended herein fully satisfy the requirements of 35 U.S.C. §§ 102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested. If any points remain in issue that may best be resolved through a personal or telephonic interview, Examiner Dinh is respectfully requested to contact the undersigned at the telephone number listed below.

Dated: January 5, 2004

Respectfully submitted, Bernd Clauberg et al.

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